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Attorney for Christian Contreras

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTIAN CONTRERAS,

Defendant.

Case No. 2:16-cr-00044-JCM-BNW-1

**STIPULATION TO CONTINUE
REVOCATION HEARING**
(Fourth Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Allison Reese, Assistant United States Attorney, counsel for the United States of America, and Richard Tanasi, newly appointed counsel for Defendant Christian Contreras, that that the Revocation Hearing currently scheduled on October 23, 2023, be vacated and continued to a date and time convenient to the Court, but no sooner than thirty (30) days from January 8, 2024, which is the jury trial date for his new criminal case. (See EM/CEF 2:22-CR-00278-CDS-DJA-1; Doc. 46)

This Stipulation is entered into for the following reasons:

1) Defendant Christian Contreras was formally indicted in a new federal case on December 13, 2022. (See EM/CEF 2:22-CR-00278-CDS-DJA-1.) He is charged with one count of Carjacking in violation of 18 U.S.C. § 2119, one count of Discharging a Firearm During and in Relation to a Crime of Violence in violation of 18 U.S.C. § 924(c)(1)(A)(iii),

1 and one count of Prohibited Person in Possession of a Firearm in violation of 18 U.S.C. §
2 922(g). (*Id.*, Doc. 1.)

3 2) A Superseding Indictment was filed on January 4, 2023 (*Id.*, Doc. 17.) and the
4 arraignment for said Indictment was held on January 11, 2023 before the Honorable
5 Magistrate Judge Nancy J. Koppe. (*Id.*, Doc. 20.) New counsel Richard Tanasi was appointed
6 on August 15, 2023. (*Id.*, Doc. 41.) The trial in this pending case has been continued to
7 January 8, 2024. (*Id.*, Doc. 46.)

8 3) A new counsel Richard Tanasi was also appointed in this instant case on August
9 28, 2023. (*See* Doc. 99).

10 4) Defense counsel requires additional time to receive the file from the prior counsel,
11 review the discovery, investigate the case, develop a trial strategy, and discuss all
12 constitutional rights related to both the trial and the final revocation hearing.

13 5) The defendant is incarcerated and does not object to continuance.

14 6) The parties agree to the continuance.

15 7) The additional time requested herein is not sought for purposes of delay.

16
17 DATED this 1st day of September 2023.

18 TANASI LAW OFFICES

JASON M. FRIERSON
United States Attorney

19 By /s/ Richard Tanasi
20 RICHARD TANASI, ESQ.
21 Counsel for Defendant

By /s/ Alisson Reese
22 ALLISON REESE
23 Assistant United States Attorney
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